

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**HAL RUDDICK, TIMOTHY THOMAS )  
FELICIA BRYANT, BARRY CARR, )  
MOSHE DAVIS, and MARSHALL MAUER )  
as Trustees of THE SERVICE )  
EMPLOYEES INTERNATIONAL UNION )  
LOCAL 4, HEALTH & WELFARE FUND, )**

**Case No. 07 C 7030**

**and )**

**HAL RUDDICK, TIMOTHY THOMAS, )  
FLOYD SCHLOSSBERG and MARSHALL )  
MAUER as Trustees of THE SERVICE )  
EMPLOYEES INTERNATIONAL UNION )  
LOCAL 4, PENSION FUND, )**

**Judge John W. Darrah**

**Magistrate Judge Valdez**

**Plaintiffs, )**

**v. )**

**REGAL HEALTH & REHAB CENTER, INC., )  
Defendant. )**

**NOTICE OF MOTION**

TO: Regal Health & Rehab Center, Inc.  
c/o Michael Lerner, President & Registered Agent  
3553 W. Peterson Avenue, Suite 101  
Chicago, IL 60659

PLEASE TAKE NOTICE that on Thursday, February 28, 2008 at 9:00 a.m., or as soon as thereafter I may be heard, I will before the Honorable John W. Darrah, or any Judge sitting in his place, at the courtroom usually occupied by him in Courtroom 1203 of the United States District Courthouse, 219 South Dearborn Street, Chicago, Illinois, 60604, and present Plaintiffs' Motion for Entry of Default, a copy of which is attached and served upon you.

Respectfully Submitted,

/s/ LaKisha M. Kinsey-Sallis  
LaKisha M. Kinsey-Sallis  
One of Plaintiffs' Attorneys

J. Peter Dowd  
Michele M. Reynolds  
LaKisha M. Kinsey-Sallis  
Steve W. Jados  
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